

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM POWDER PRODUCTS MARKETING, SALES PRACTICES AND PRODUCTS LIABILITY LITIGATION	DOCKET # 3:16-md-2738 (FLW) (LHG)
THIS DOCUMENT RELATES TO: ALL CASES	JUDGE FREDA L. WOLFSON MAG. JUDGE LOIS H. GOODMAN

**RICHARD L. ROOT’S RESPONSE TO JOINT APPLICATION FOR APPOINTMENT
OF THE PLAINTIFFS’ STEERING COMMITTEE AND DEFENDANTS’ RESPONSE**

Applicant, Richard L. Root, respectfully submits this response to the Joint Application to the Plaintiff’s Steering Committee, and to the Defendants’ response.

First, the Defendants’ response quoted language from the undersigned’s application for appointment to the Plaintiff’s Steering Committee, wherein Applicant disclosed that Morris Bart, LLC “self-funds its mass torts practice.” That statement was included in the application to meet the Court’s direction that applicants provide information regarding the resources that applicants could bring to the Plaintiff’s Steering Committee, if selected. The quoted language was a simple statement of fact, meant to suggest nothing more than the Applicant’s fitness for the position applied for, and in no way meant to convey any hidden message or implication concerning other prospective applicants’ financial resources.

Second, to the extent that this Court assigns committee and leadership roles in its order forming the Plaintiff’s Steering Committee, as requested by Joint Applicants, the undersigned Applicant informs the Court that he is willing to serve on the Executive Committee, the Trial

Committee, the Discovery Committee, or to serve in any role the Court or fellow committee members deem beneficial to the completion of the Plaintiff's Steering Committee's mission.

Respectfully submitted,

MORRIS BART, LLC

By: /s/ Richard L. Root
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CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

By: /s/ Richard L. Root